

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

THE RYAN N. RICE 2018)
IRREVOCABLE TRUST,)
)
 Plaintiff,) Case No.: 1:22-cv-03003-BPG
 v.)
)
 REHAB.COM, LLC, CCR HOLDINGS,)
 LLC, and PATRICK NAGLE,)
)
 Defendants.)

**CONSENT MOTION FOR EXTENSTION OF TIME TO FILE
RESPONSIVE PLEADINGS AND CORPORATE DISCLOSURE STATEMENTS**

Defendants, Rehab.com, LLC, CCR Holdings, LLC, and Patrick Nagle (collectively, “Defendants”), by and through their respective undersigned attorneys, with the consent of Plaintiff The Ryan N. Rice 2018 Irrevocable Trust (“Plaintiff”), hereby move this Court for an Order extending the time for Defendants to respond to the Complaint in this matter, and file Corporate Disclosure Statement, through and including January 17, 2023. In support thereof, Defendants state as follows:

1. On November 19, 2022, Plaintiff filed an eight-count Complaint against Defendants alleging claims for, *inter alia*, fraud, fraudulent conveyance, negligent misrepresentation, breach of contract, breach of fiduciary duty, alter ego liability, and injunctive relief. Plaintiff’s claims arise out of a loan Plaintiff previously extended in connection with the business ventures of Defendants.

2. Defendants were served with the Complaint on or about November 23, 2022 and recently retained the undersigned counsel, Zuckerman Spaeder LLP (for Rehab.com, LLC and CCR Holdings, LLC) and Rosenberg Martin Greenberg, LLP (for Patrick Nagle), to represent

them in this matter. Given the breadth and scope of the allegations in the Complaint, Defendants require a short extension of time to respond to the Complaint.

3. Defendants therefore request that this Court extend the deadline for Defendants to file their responsive pleadings and Local Rule 103.3 Corporate Disclosure Statements until January 17, 2023.¹
4. This Consent Motion is made in good faith and not for the purpose of delay.
5. No party will be prejudiced by the requested extension.
6. Plaintiff consents to the relief sought herein.
7. This is the first request for an extension of time to file responsive pleadings.
8. Based on the foregoing, there is good cause to extend the time for Defendants to respond to the Complaint and file Corporate Disclosure Statements.

WHEREFORE, Defendants request this Court enter an Order extending the time for them to file responsive pleadings to the Complaint and Local Rule 103.3 Corporate Disclosure Statements up to and including January 17, 2023.

Respectfully submitted,

/s/ Adam Abelson
 Adam Abelson, Fed Bar # 29532
 Zuckerman Spaeder LLP
 100 East Pratt Street, Suite 2440
 Baltimore, Maryland 21202
 (410) 949-1148 (phone)
 aabelson@zuckerman.com

*Attorneys for Defendants Rehab.com, LLC
 and CCR Holdings, LLC*

/s/ Jeffrey M. Lichtstein
 Gerard P. Martin, Fed Bar # 00691
 Jeffrey M. Lichtstein, Fed Bar # 20731
 Rosenberg Martin Greenberg, LLP
 25 South Charles Street, 21st Floor
 Baltimore, Maryland 21201
 (410) 727-6600 (phone)
 gmartin@rosenbergmartin.com
 jllichtstein@rosenbergmartin.com

Attorneys for Defendant Patrick Nagle

¹ The Court is closed on January 16, 2023 in observance of the Birthday of Martin Luther King, Jr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 12th day of December, 2022, a copy of the foregoing **Defendants' Consent Motion for Extension of Time to File Responsive Pleadings and Corporate Disclosure Statements** was electronically filed on CM/ECF and served on the following:

Michael E. Blumenfeld
Wesley T. Moran
Rob Lindholm
Shannon Coy
Nelson Mullins Riley & Scarborough LLP
100 S. Charles Street, Suite 1600
Baltimore, Maryland 21201

Jeffrey M. Lichtstein

Jeffrey M. Lichtstein

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